

From: [Ketu, Rupika](#)
To: [Carpenter, Angela](#); [Vaughn, Stephanie](#)
Subject: FW: Rolling Knolls Site - Additional Department Comments on the Draft FS
Date: Wednesday, September 28, 2022 3:31:00 PM

FYI wanted to get MC's input again

From: Clemetson, Michael <Clemetson.Michael@epa.gov>
Sent: Wednesday, September 28, 2022 3:30 PM
To: Ketu, Rupika <Ketu.Rupika@epa.gov>
Cc: Jackson, Amelia <Jackson.Amelia@epa.gov>
Subject: RE: Rolling Knolls Site - Additional Department Comments on the Draft FS

Hi Rupika,

I have no issues with the development of ecological based preliminary remediation goals (PRGs) for the Rolling Knolls site.

The NJDEP's comments are correct, less conservative toxicity reference values (TRVs) were included, however, they were used for comparative purposes along with the original TRVs from the BERA. Since this evaluation was conducted in more of a risk management framework (Feasibility Study), less conservative data were also used. The purpose of the Residual Ecological Risk Assessment (rERA) was to assess the residual ecological risk after the various potential remedial alternatives were taken to provide information in support of the PRGs that are developed in the Feasibility Study. The rERA included the TRVs from the Baseline Ecological Risk Assessment (BERA) as well as other TRVs from EPA's Ecological Soil Screening Level guidance (ECO-SSL) to estimate post-remedy ecological risk. These data would then be used for comparison purposes to assist risk management when selecting appropriate PRGs.

Thanks,

Mike

From: Ketu, Rupika <Ketu.Rupika@epa.gov>
Sent: Tuesday, September 27, 2022 5:38 PM
To: Clemetson, Michael <Clemetson.Michael@epa.gov>
Subject: FW: Rolling Knolls Site - Additional Department Comments on the Draft FS

Hi Mike,

I wanted to check in with you in regards to NJDEP's comments on the BERA. Would you be able to provide your thoughts on the following points made in their comments? More specifically, do you agree with their comments/approach? Thanks!!

1. Eco risk-based PRGs are paramount for determining the extent of remediation and should be developed for key eco risk driving contaminants in the FS, especially considering that human health-based ARS are not sufficient for the protection of ecological receptors that utilize the property. The 2016 BERA demonstrated elevated risk, whereby lowest observed adverse effect levels (LOAELs) based on HQs exceeded 1 for several contaminants and receptor groups.
2. In regards to Appendix C, Residual Eco Risk Eval.
 - a. Toxicity reference values (TRV) employed in the residual risk assessment were much less conservative than those used in the BERA, some by orders of magnitude.
 - b. NJDEP does not agree with the dual TRVs approach applied in the residual eco risk assessment or the findings.
 - c. NJDEP believes a single TRV set (NOAEL and LOAEL) evaluating the more sensitive species and endpoints to characterize risk to invertebrates, fish, birds, and wildlife should be utilized throughout the eco risk assessment process.
 - d. The same set of conservative TRVs used in the BERA should be used for the calculation of site-specific eco risk-based PRGs and to evaluate the residual risk remaining after implementation of a remedy.
3. NJDEP request risk-based eco PRGs be developed for the site.

Rupika

From: McKenzie, Jill [DEP] <Jill.McKenzie@dep.nj.gov>

Sent: Monday, June 13, 2022 5:48 PM

To: Ketu, Rupika <Ketu.Rupika@epa.gov>

Cc: Erica Snyder <Erica.Snyder@dep.nj.gov>; Nancy Hamill <Nancy.Hamill@dep.nj.gov>; Russo, Michael [DEP] <Michael.Russo@dep.nj.gov>

Subject: Rolling Knolls Site - Additional Department Comments on the Draft FS

As discussed in our May 23, 2022 conference call, attached please find the Department's additional comments on the March 2021 Draft Feasibility Study Report. As discussed in the attached correspondence, the Department is of the opinion that ecological risk-based PRGs should be developed during the FS phase of the project. This will enable a more accurate assessment of the remedial alternatives being considered for the site. Let me know if you have any questions in regard to this matter. - Jill